

ORIGINAL

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

RECEIVED

JUL 10 1995

In the Matter of )

**Digital Data Transmission Within  
the Video Portion of Television  
Broadcast Station Transmissions.**

)  
)  
)  
)  
)

**MM Docket No. 95-42**  
**RM-7567**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

DOCKET FILE COPY ORIGINAL

To: The Commission - Mail Stop 1170

**REPLY COMMENTS OF RADIO TELECOM & TECHNOLOGY INC.**

1. Radio Telecom & Technology Inc. ("RTT") herein submits its reply comments in the above-captioned proceeding. RTT is a developer and manufacturer of new technologies, including technologies related to broadcasting. It filed initial comments on June 23, 1995, supporting the adoption of rules in this proceeding that will allow broadcasters wide flexibility to utilize new digital technologies integrated with NTSC television transmission, but without the adoption of a mandatory or protected technical standard.

2. The initial comments in this proceeding have confirmed what RTT stated in its comments -- that there are several manufacturers developing technologies for imbedding data in the NTSC video waveform; and even if the Commission were inclined to adopt a technical standard, it is much too early to do so at this time. It is also apparent from the initial comments that parties who want to use digital data technologies believe that they must get started promptly, both to get a foothold before wireline telephone and cable companies capture the market and to have time to exploit NTSC-based technologies

No. of Copies rec'd 0+9  
List ABCDE

before NTSC gives way to a new advanced television system. Thus whatever benefits may ultimately accrue from studies and recommendations by the National Data Broadcast Committee ("NDBC"), it would be a mistake to await conclusion of the NDBC's work -- not anticipated until the second quarter of 1996 assuming no delays -- to allow non-interfering digital data transmissions to begin.<sup>1/</sup>

3. A telling point against adopting a mandatory or protected technical standard is that such a standard is necessary only for services to be provided to a substantial portion of the general public. It is apparent from the initial comments that many, if not most, proponents of TV digital data have in mind subscription-based rather than broadcast data services. Therefore, it is not likely that there will be a need for an inexpensive decoding chip in everyone's television set, and there is no more reason to have a uniform technical standard for digital data than there is for subscription television services under Section 73.644 of the Commission's Rules or for the format of vertical blanking interval data transmissions under Section 73.646. The public should be more than amply protected if the Commission relies on the self-interest of broadcasters to cease any operation that

---

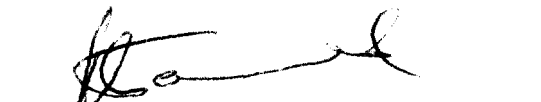
<sup>1/</sup> There is another reason, beside the burden of delay, for not awaiting the results of NDBC studies. RTT has not participated fully in the latest phases of the NDBC's work because the NDBC has not been able to protect confidential and proprietary technical material in its deliberations. All material submitted is widely distributed, and RTT is not willing to work on that basis at this time. Moreover, if testing proceeds at the Advanced Television Test Center, there will undoubtedly be substantial charges imposed on system proponents. Thus the NDBC system is only for parties who are wealthy and do not have propriety data to protect. RTT does not believe that that system is optimum for evaluating which technology can best provide innovative services to the public.

causes interference to reception of broadcast audio and video; and if the Commission is concerned about adjacent-channel interference, it can deal with that specific issue by requiring that data transmission equipment be type accepted or certified under Part 2 of the Rules.<sup>2/</sup>

4. In sum, RTT again urges the Commission to approve non-interfering digital data transmissions promptly, without an individual station authorization and without a uniform mandatory or protected technical standard.

Louis Martinez, President  
Radio Telecom and Technology, Inc.  
6951 Flight Road, Suite 210  
Riverside, CA 92504  
Tel 909-687-2660  
Fax 909-687-3892

Respectfully submitted,

  
Peter Tannenwald

Irwin Campbell & Tannenwald, P.C.  
1320 - 18th St., N.W., Suite 400  
Washington, DC 20036-1811  
Tel 202-728-0401 ext. 105  
Fax 202-728-0354

July 10, 1995

---

<sup>2/</sup> Subscription television systems are approved under Part 2; and once approved, they may be used at will by any broadcaster without individual station authority from the Commission. The same regime should apply to digital data transmissions. If the Commission wants to maintain records of where different kinds of equipment are being used, it can impose a simple notification requirement on broadcasters.